

Bernard P. Kenneally, Esq. (SBN 113160)  
3186 Old Tunnel Road  
Lafayette, California 94549  
Telephone: (925) 947-2525  
Facsimile: (925) 947-2522  
Email: bpkesq@yahoo.com

Attorney for Plaintiff Les Fields/C.C.H.I. Insurance Services

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

LES FIELDS/C.C.H.I. INSURANCE SERVICES, a  
California Corporation,

Plaintiff,

vs.

STUART M. HINES, an individual, DEBORAH  
CANADAS, an individual, RISK MANAGEMENT  
AND REINSURANCE SERVICES, INC., a  
California Corporation, INTERREMEDIY  
INSURANCE SERVICES, LLC, a California  
Limited Liability Company, and DOES 1 through 99,  
inclusive,

Defendants.

**Case No.: 15-cv-03728 MEJ**

**“REVISED” NOTICE OF JOINT  
STIPULATION RE: MOTIONS IN  
LIMINE**

Due Date: June 5, 2017  
Courtroom: C, 15<sup>th</sup> Floor  
Magistrate Judge: Hon. Maria-Elena James

Trial Date: October 16, 2017

**TO THE HONORABLE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA, AND ALL PARTIES AND TO THEIR  
ATTORNEYS OF RECORD HEREIN:**

**PLEASE TAKE NOTICE** that under the Court’s Orders dated May 8, 2017 (Dkt. No. 124)

1 and May 31, 2017 (Dkt. No. 132), Plaintiff Les Fields/C.C.H.I. Insurance Services, a California  
2 corporation (“CCHI”), by its counsel files the following “Revised” Joint Stipulation:

3 **MOTIONS IN LIMINE (“MILs”) FILED BY EACH PARTY**

4 **CCHI’s MILs –**

5 **MIL #1:** EXCLUDE TAX MATTERS (Dkt. No. 117)

6 **MIL #2:** EXCLUDE LES’ ESTATE PLANNING & STOCKHOLDER INFO (Dkt. No. 118)

7 **MIL #3:** EXCLUDE EMPLOYEE THEFT INSURANCE & RECOVERY (Dkt. No. 119)

8 **MIL #4:** STRIKE DEFENDANTS’ BOILERPLATE AFFIRMATIVE DEFENSES (Dkt. No. 121)

9 **MIL #5:** JURY QUESTIONNAIRE (Dkt. No. 122)

10 **Defendant Hines’ MILs –**

11 **MIL #1:** EXCLUDE OPINION TESTIMONY OF LAY WITNESS MICHAEL NEALY  
12 REGARDING LIABILITY AND DAMAGES (Dkt. No. 106)

13 **MIL #2:** EXCLUDE EVIDENCE OF THE CLAIMS AND CAUSES OF ACTION THAT ARE  
14 BARRED BY THE COURT ORDER RE: DEFENDANTS’ MOTIONS FOR SUMMARY  
15 JUDGMENT (Dkt. No. 108)

16 **MIL #3:** EXCLUDE EVIDENCE OF PREJUDICIAL VOICE MAIL RECORDING (Dkt. No. 110)

17 **MIL #4:** EXCLUDE EVIDENCE OF CCHI’S RECEIPT OF PAYMENTS FROM EMPLOYEE  
18 THEFT INSURERS (Dkt. No. 111)

19 **MIL #5:** EXCLUDE MICHAEL A. NEALY’S ACCOUNTING REPORTS AS INADMISSIBLE  
20 HEARSAY EVIDENCE (Dkt. No. 113)

21 **MIL #6:** EXCLUDE EVIDENCE OF ALLEGED UNFAVORABLE FACTS REGARDING  
22 STUART HINES (Dkt. No. 115)

23 **MIL #7:** EXCLUDE EVIDENCE THAT PLAINTIFF FAILED TO DISCLOSE PURSUANT TO  
24 RULE 26 (Dkt. No. 116)

25 **InterRemedy Defendants’MIL -**

26 **MIL #1:** EXCLUDE EVIDENCE BEYOND THE SCOPE OF THE COURT’S MSJ ORDER  
(Dkt. No. 120)

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1 Dated: June 5, 2017

*/s/ James G. Lucier*

2 By: \_\_\_\_\_  
3 James G. Lucier, Attorney for Defendant  
4 Stuart M. Hines

5 Dated: June 5, 2017

*/s/ Christopher L. Aguilar*

6 By: \_\_\_\_\_  
7 Christopher L. Aguilar, Attorney for Defendants  
8 Interremedy Insurance Services, LLC, Deborah  
9 Canadas, Joyce Sykes McGuire, and Kim Willoughby

10 **SO ORDERED** this 6th day of June 2017.

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13 Maria-Elena James Magistrate Judge  
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I work in Lafayette, California, County of Contra Costa, and State of California. I am over the age of 18 and not a party to the within action. My business address is located at 3186 Old Tunnel Road, Lafayette, California 94549.

**“REVISED” NOTICE OF JOINT STIPULATION RE: MOTIONS IN LIMINE**

**Christopher Luis Aguilar**  
Aguilar Legal and Business Consulting Corp.  
21 Columbus Avenue, Suite 225  
San Francisco, California 94111

**James G. Lucier**  
Clapp, Moroney, Bellagamba, Vucinich, Beeman &  
Scheley  
A Professional Corporation  
1111 Bayhill Drive, Suite 300  
San Bruno, California 94066

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/S/  
Bernard P. Kenneally